

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MALEEHA AHMAD)	
)	
and)	
)	
ALISON DREITH,)	
)	
<i>on behalf of themselves and a class of</i>)	
<i>similarly situated individuals,</i>)	
)	
Plaintiffs,)	
)	
v.)	
)	Case No.: 4:17-CV-2455 RLW
CITY OF ST. LOUIS, MISSOURI,)	
)	
Defendant.)	

AFFIDAVIT OF SARAH MOLINA

I, SARAH MOLINA, declare as follows:

1. I am over the age of 18. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to those facts if called as a witness.
2. I was present at the intersection of Walton Avenue and Page Boulevard, on August 19, 2015. I witnessed the St. Louis Metropolitan Police Department indiscriminately use tear gas without giving an audible and intelligible warning. I was standing close enough to the line, that if an adequate warning had been given, I would have heard it. I also witnessed them use tear gas several blocks away from the protest site.
3. On the afternoon of September 15, 2017, I was present at the intersection of Tucker Avenue and Clark Avenue. I saw many people who had been pepper sprayed, crying and in pain. I also saw many people with white liquid on their faces after being treated by medics for chemical weapon exposure.

4. On the mornings of Saturday, September 16, 2017 and Monday, September 18, 2017, I was outside the St. Louis Justice Center when people were being released from jail. People exited the jail with abrasions, bruises, welts, cuts, torn clothing, and still had pepper spray on their skin.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on 9/22/17

Sarah Molina
Sarah Molina

Subscribed and sworn to before me this 22nd day of September, 2017.



KATHRYN M. HINNERS-MUELLER
My Commission Expires
May 12, 2018
St. Louis City
Commission #14614956

Kathryn M Hinnert-Mueller
Notary Public